

United States District Court  
District of New Jersey

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

Fifi Graham

VS.

Dr. Todd C. Ryan

2:16-cv-04912-CCG-JBC  
JAN 20 2017

Third Amended Complaint

I Fifi Graham injured my right shoulder  
on my job ongoing surgery by Workmen Compensation  
Dr. Todd Ryan failure to perform surgery in  
accordance with recommendation from orthopedic surgeon  
to remove fragment of hardware embedded in Lumerus.  
This negligent of care resulted in chronic pain, range  
of motion limitation, and diminished capacity to perform  
activities of daily living per prior level of independent  
function, decreased active movement and chronic  
pain, A case of Mal-practice.

I declare under penalty of  
perjury that the foregoing is true  
and correct. January 20, 2017

Fifi Graham  
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Fifi Graham